

Chapter 8

Superfund Program Support Activities

In addition to direct clean-up and enforcement activities, EPA undertook actions in FY92 to improve community relations, enhance public access to Superfund information, and strengthen its partnership with states and Indian tribes. This chapter highlights progress in these areas, as well as progress in encouraging minority firm participation in Superfund contracting, as required by Section 105(f) of CERCLA.

8.1 COMMUNITY RELATIONS AND TECHNICAL ASSISTANCE GRANTS

Superfund's community relations program is based on a commitment to inform citizens who are potentially affected by Superfund sites about those sites and to involve these citizens in the Superfund clean-up process. Thus, EPA directs its efforts towards

- Informing the public of planned or ongoing actions;
- Giving the public an opportunity to comment on and provide input for technical decisions; and
- Focusing on and resolving conflict.

The guideline for EPA's proactive community relations program is "early, often, and always." EPA must begin outreach activities early in the Superfund

process, meet with citizens on a regular basis, and always listen to citizens' concerns. There is no formula for approaching a community; each community is unique and requires a communication strategy designed to meet its needs.

EPA's policy of enhanced community involvement is demonstrated by its continuous efforts to tailor community relations activities for each community and identify effective approaches for reaching concerned citizens. In addition to the statutorily required community relations activities, EPA often uses innovative communication techniques. For example, EPA holds "open houses" and uses various media such as public access television and video monitoring equipment to enhance information transfer between EPA and local citizens and to promote greater public understanding of and participation in site activities.

As EPA moves to streamline the Superfund process through the Superfund Accelerated Clean-Up Model, the Agency remains committed to promoting meaningful community involvement in decision making during all phases of site clean-up activity. In fact, EPA views early and frequent public involvement as pivotal to the success of EPA's mission to protect human health and the environment.

During FY92, EPA continued to improve the already active community relations program by finalizing a rule to streamline the Technical Assistance Grant (TAG) program.

Acronyms Referenced in Chapter 8	
CA	Cooperative Agreement
CPCA	Core Program Cooperative Agreement
DBE	Disadvantaged Business Enterprise
IAG	Interagency Agreement
MBE	Minority Business Enterprise
MOU	Memorandum of Understanding
NAMC	National Association of Minority Contractors
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
NSP	Navajo Superfund Program
NTIS	National Technical Information Service
OSDBU	Office of Small and Disadvantaged Business Utilization
PRP	Potentially Responsible Party
RA	Remedial Action
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RI/FS	Remedial Investigation/Feasibility Study
SB	Small Business
SDB	Small Disadvantaged Business
SSC	Superfund State Contract
TAG	Technical Assistance Grant
WBE	Women's Business Enterprise

8.1.1 Fiscal Year 1992 Highlights

EPA enhanced its community relations program in FY92 by improving community relations guidance, training tools, and outreach materials. For example, EPA published *Community Relations in Superfund: A Handbook*, which is the result of efforts by EPA Headquarters and Regional staff to develop a comprehensive community relations policy for the Superfund program. The handbook includes updated and expanded guidance on community relations requirements and policies, interagency coordination, and program administration. The handbook also contains guidance on the TAG program and "risk" communication. Detailed appendices in the handbook provide examples of community relations activities, samples of the community relations plan/proposed plan/responsiveness summary, and community relations directives and fact sheets.

In a parallel effort, EPA revised and expanded its community relations skills course in FY92 to ensure that EPA staff members are equipped with the latest community relations skills and techniques and that they have a thorough understanding of

community relations requirements at Superfund sites. During FY93, EPA will offer this course to community relations staff across the country in various Regional offices and state capitals.

To promote a better public understanding of the Superfund program, EPA published 13 fact sheets, designed specifically for the public, on Superfund topics. The fact sheets include

- *Superfund: An Overview*,
- *Identifying Sites*,
- *The Removal Program*,
- *The Remedial Program*,
- *Exposure Pathways*,
- *Public Involvement*,
- *Community Interviews*,
- *Trichloroethylene*,
- *Arsenic*,
- *Benzene*,
- *Polychlorinated Biphenyls*,
- *Information Repository*, and
- *Information Repository (for Librarians)*.

These fact sheets and other outreach documents are available to interested parties from Regional Community Relations Coordinators. In response to requests of concerned communities for better understanding of "risk," EPA also developed a course entitled *Risk Communication for Citizens: A Workshop*.

8.1.2 Technical Assistance Grants Under CERCLA Section 117(e)

The TAG program is an EPA community outreach program designed to help citizens become more knowledgeable about the technical and scientific aspects of a Superfund site and thus become better able to participate effectively in the clean-up process. CERCLA Section 117(e), as amended by SARA, authorizes EPA to award TAGs of up to \$50,000 to local groups affected by National Priorities

List (NPL) sites or by sites where preliminary work has begun. Using TAG funds, local groups can employ technical advisors to assist them in understanding the conditions at hazardous waste sites and of the Superfund clean-up process.

EPA's continuing efforts to enhance the TAG program and encourage increased public participation reflect a commitment to meaningful public involvement. As part of its commitment, EPA promulgated the TAG final rule on October 1, 1992, (57FR45311) to streamline TAG procedures. Under the TAG final rule,

- Procurement procedures have been simplified. The streamlined procedures expedite the process of hiring technical advisors. Recipients are no longer required to follow the procurement procedures required for larger federal grants.
- The application process has been streamlined. An application can now serve as both a Letter of Intent (to apply) and an application.
- The types of allowable activities have been expanded. Grant funds may now be used to pay an individual with the appropriate skills to manage the grant for community groups. This addition was made specifically for community groups that lack the expertise to administer a federal grant. Also, the final rule allows grant funds to be used to pay for health and safety training, if necessary, to enable the technical advisor to gain site access.
- The administrative cap of 20 percent has been reinstated. In light of the additional allowable activities, the 20 percent cap on administrative costs safeguards limited TAG funds for the intended purposes.
- Regions, rather than Headquarters, can now grant waivers of up to \$50,000 for TAGs to help streamline the process. This action removes the requirement for Headquarters to approve the waiver. Additional funding also will be available for unusually large and complex sites.
- Language concerning ineligible applicants has been strengthened. The final rule clarifies the extent and nature of allowable potentially

responsible party (PRP) involvement in an applicant group. It also clarifies eligibility requirements for applicants, thus enabling EPA to identify ineligible parties early in the application process.

To provide technical support to communities, EPA has awarded 103 TAGs worth more than \$5 million. This total includes 37 TAGs awarded in 9 Regions in FY92. FY92 TAG awards represent a 54 percent increase over the number of TAGs awarded in FY91. Exhibit 8.1-1 illustrates the increasing number of TAGs awarded under the Superfund program since TAGs were first awarded in FY88.

8.2 A COORDINATED APPROACH TO PUBLIC INFORMATION

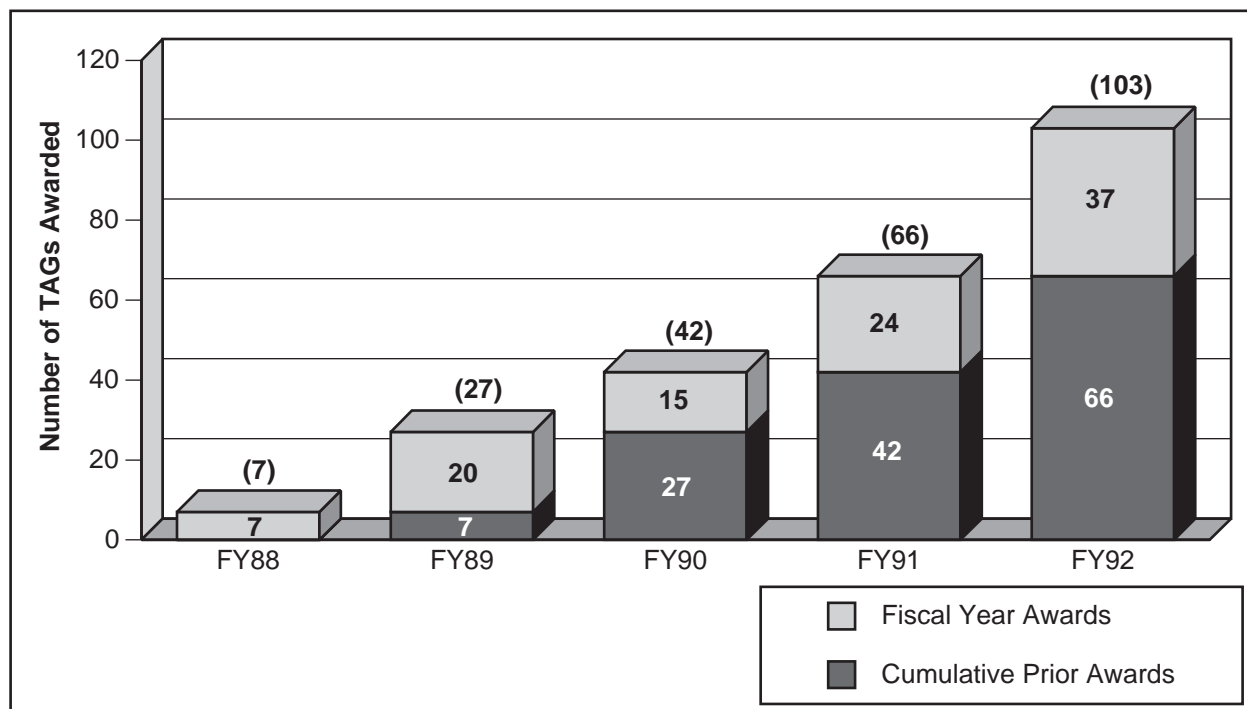
The Agency's public information outreach program is built on a system of document coordination and management. All Superfund documents are listed in the *Compendium of Superfund Program Publications* and its regular update bulletins. (Single copies of this publication are available free upon request.)

FY92 marked the end of EPA's first five-year plan to standardize and manage the extensive Superfund document collection and to incorporate it in public information and outreach activities. The plan included designing a simplified inventory management program for Superfund documents, the Superfund Docket, and the Resource Conservation and Recovery Act (RCRA)/Superfund Hotline, as well as for the services provided by the Department of Commerce's National Technical Information Service (NTIS).

EPA began several key projects that will serve as the basis for a second five-year plan to enhance information access.

- EPA established a new communications and outreach plan. Closely linked to the document management and delivery systems, its central coordinating role will help ensure that the program "speaks with one voice."

Exhibit 8.1-1
Number of Technical Assistance Grants Awarded from
Fiscal Year 1988 Through Fiscal Year 1992



Source: Office of Emergency and Remedial Response/Hazardous Site Control Division.

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- Working with NTIS, EPA launched an aggressive public campaign to make Superfund document users aware of the extensive customer-oriented services offered by NTIS. Purchases of Superfund technical documents from NTIS increased by nearly 900 percent from the close of FY91 to the close of FY92. The joint EPA-NTIS effort also resulted in better service to the customer and achieved a significant reduction in the costs of printing Superfund documents.
- EPA developed a limited centralized distribution list for EPA Regional and Headquarters personnel and state, local, and select external contacts. This centrally maintained system became fully operational during the fiscal year and is expected to result in increased efficiency and cost savings.

Superfund information services available to the public are described in detail below.

The National Technical Information Service

The Department of Commerce's NTIS serves as a permanent archive and general source of federal publications, including Superfund documents. In the past, EPA had provided more than two million Superfund documents to interested parties free of charge. Unfortunately, because of resource constraints, this approach is no longer possible. EPA, nevertheless, remains committed to ensuring that Superfund documents will continue to be available to the public. Accordingly, the Agency and NTIS have embarked on an ambitious joint project that will bring the entire Superfund collection within quick and easy reach of all users.

NTIS has established a Superfund Order Desk where users may purchase single copies or customized subscriptions for categories of documents pertinent to their needs. Pre-publication documents are available at the Superfund Order Desk prior to

completion of formal printing and distribution. The joint EPA-NTIS outreach and marketing effort during FY92 informed all regular users about this service.

In addition to quick access, the Agency's public information outreach program is committed to providing high quality documents. To ensure that both goals are met, the interagency Quality Action Team monitored the program throughout FY92 and will continue its efforts throughout FY93 under the Agency's total quality management program.

The Superfund Docket

The Superfund Docket provides public access to the materials that support proposed and final regulations. In compliance with the Freedom of Information Act, the public is allowed access to docket materials following approval of the material by the Office of General Counsel and announcement of the proposed or final regulation in the *Federal Register*. The docket also maintains viewing copies of records of decision as well as a limited stock of the *Federal Register* containing Superfund regulatory information.

Other Information Sources

The RCRA/Superfund Hotline provides information to the public and EPA personnel concerning hazardous waste regulations and policies. With regard to Superfund, the hotline is a comprehensive source of general information about ongoing program developments.

EPA also maintains the Hazardous Waste Superfund Collection at EPA Headquarters and Regional libraries. The collection contains documents ranging from records of decision to commercially produced books on hazardous waste and Superfund.

8.3 EPA'S PARTNERSHIP WITH STATES AND INDIAN TRIBES

EPA continues to promote and maintain its partnership with states and Indian tribes in the Superfund clean-up process. Subpart F of the National

Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the administrative requirements in 40 *CFR* Part 35, Subpart O provide mechanisms for ensuring meaningful state and Indian tribe involvement in implementing Superfund response activities, as required by Section 121(f) of CERCLA. Subpart O describes EPA's authority to transfer funds and responsibilities to states and Indian tribes so that they can undertake response actions in accordance with the NCP. It also describes the assurances required under CERCLA Section 104 from states and Indian tribes.

8.3.1 Response Agreements and Core Program Cooperative Agreements

Response agreements provide states, Indian tribes, and political subdivisions with the opportunity to participate in response activities at sites under their jurisdiction. Superfund core program cooperative agreements (CPCAs) assist states and Indian tribes in developing their overall response capabilities.

Response Agreements

Response agreements fall into two categories: Superfund state contracts (SSCs) and cooperative agreements (CAs). Both kinds of agreements serve as the contractual tools through which states, Indian tribes, and political subdivisions work with EPA in Superfund response activities.

Certain prerequisites are common to all response agreements. States, Indian tribes, and political subdivisions must demonstrate the ability to track costs in accordance with EPA financial and administrative standards. For remedial (long-term) action to occur, they must provide the Agency with certain other assurances. These include assuring the operation and maintenance of remedies, meeting a cost-sharing requirement, assuring a 20 year capacity for disposal or treatment of hazardous wastes, providing off-site disposal, and assuring interest in real property.

Superfund State Contracts: SSCs are required when EPA is the lead agency for remedial activities. Through these contracts, states, Indian tribes, and political subdivisions provide EPA with statutorily required assurances. These contracts specify the process for collection of cost-share payments from states, Indian tribes, and political subdivisions, as required by CERCLA Section 104. The cost share is generally 10 percent of the cost of the remedial action (RA) and is not applied to planning activities such as the remedial investigation/feasibility study (RI/FS) or remedial design (RD).

SSCs also are required when a political subdivision assumes the lead for remedial activities. The parties to this kind of SSC include EPA, the state, and the political subdivision. The SSC must be in place before EPA can transfer CA funds to the political subdivision.

Lead-Agency Cooperative Agreements: Lead-agency CAs facilitate the implementation of the NCP by enabling states, Indian tribes, and political subdivisions (with appropriate hazardous waste management capability and sufficient resources) to assume lead-agency responsibility for many response activities. As the lead agency, the state, Indian tribe, or political subdivision is provided with Superfund monies to plan and manage studies, RDs, and clean-up activities at specified sites within their jurisdictions. For an RA, a state-lead CA documents the state's cost share (cash or in-kind services) and other CERCLA Section 104 assurances.

Support-Agency Cooperative Agreements: Support-agency CAs facilitate the implementation of the NCP by allowing states, Indian tribes, and political subdivisions that do not have the lead-agency responsibility to actively participate as a support agency in response activities at sites under their jurisdiction. The state, Indian tribe, or political subdivision assists the lead agency by sharing its information and expertise, and also benefits from the experience of participating in a Superfund response action.

Removal Cooperative Agreements: Removal CA funds are used by states, Indian tribes, and political subdivisions to conduct non-time-critical removal actions. Non-time-critical removal actions are those

in which the nature of the action allows a planning period of more than six months. Although states, Indian tribes, and political subdivisions are not required to share in the cost of removal actions, EPA strongly encourages cost sharing. The removal CA documents the scope of work for the non-time-critical removal action.

Enforcement Cooperative Agreements: Enforcement CA funds may be used by a state to undertake PRP searches, issue notice letters for negotiation activities, undertake administrative and judicial enforcement actions, and oversee PRP response actions.

To be eligible for enforcement CA funding under Subpart O, states must submit the following to EPA:

- A letter from the state Attorney General certifying that the state has the capability to pursue enforcement actions;
- A copy of the statute that authorizes the state to undertake enforcement actions; and
- Any further documentation required by EPA to establish the state's capability to undertake the enforcement activities.

Core Program Cooperative Agreements

The legislative history of SARA Section 104(d) indicates the intent of Congress to increase the scope of CERCLA funding to include certain basic, or core, activities of states and Indian tribes that are not attributable to a specific site, but are important to the improvement of their overall response capabilities. EPA meets the requirements of SARA Section 104(d) through Superfund CPCAs.

Through CPCAs, EPA offers states and Indian tribes the opportunity to develop comprehensive, self-sufficient Superfund programs. CPCAs have a single budget and scope of work designed to enhance state or Indian tribe program activities. Approval of the budget request and scope of work is dependent on the developmental needs of a state or Indian tribe program, demonstrated progress in meeting previous core objectives, and availability of funds. States are required to provide a 10 percent cost share for core program awards.

EPA typically budgets and distributes \$10 million to \$13 million in CPCAs annually among the 10 Regional offices. Regions have the discretion to provide additional funding from certain other funding categories if monies are available. During FY92, 51 CPCAs were in effect for states and Indian tribes; 21 of the CPCAs had multi-year budget periods.

EPA intends that the core program lay the groundwork for the implementation of an integrated EPA-state/Indian tribe approach for meeting Superfund goals. The program is in its sixth year of implementation, and EPA is reviewing its effectiveness to identify potential areas for improvements. In FY92, EPA examined activities in six states and determined that the core program was effectively building and sustaining state programs. EPA will conduct assessments of additional states in FY93.

8.3.2 Fiscal Year 1992 Highlights

Under authority of the NCP and in compliance with administrative requirements in 40CFR Part 35, Subpart O, states, and Indian tribes took the lead on several federal Superfund clean-up projects during FY92. States and Indian tribes supervised the initiation of two RI/FSs, five RDs, six RAs, and two removal actions.

State Highlights

To support increased state involvement in Superfund, EPA participated in several efforts to provide states with information about the program. EPA and the Association of State and Territorial Solid Waste Management Officials sponsored a conference for state Superfund managers to exchange information on developing and implementing state and federal Superfund programs. The state/EPA conference in FY92, which was the third conference in the series, was attended by over 160 participants representing 44 states, 2 territories, 2 Indian tribes, EPA, and other federal agencies. The theme of the conference was accomplishing cleanups within budgetary constraints. Discussion areas included the clean-up process, voluntary cleanups, cost recovery, and the state role in the Superfund program.

The Agency continued to offer the response agreements seminar to provide EPA and state staff with the skills and information needed to administer CAs and SSCs. The three-day seminar provides information on the contractual mechanisms, including their purposes and applications. It identifies steps necessary to fulfill a response agreement, explains state assurances, assists state project officers in calculating a state's cost share, and describes techniques for managing response agreements. During FY92, the Agency conducted two seminars involving 52 state and federal participants. The Agency plans to conduct additional seminars during FY93.

To provide an on-line information exchange, EPA funded and developed a state Superfund network. The network is an information exchange bulletin board for state Superfund program representatives. Network services offered include weekly news items and electronic mail services, as well as a document service and databases that provide users full-text search capabilities. As of the end of FY92, efforts were underway to provide access to the network to EPA Regional Superfund offices.

Indian Tribe Highlights

In FY92, the Superfund program was actively involved in addressing hazardous waste problems on Native American lands and in assisting Indian tribes in assuming regulatory and program management responsibilities. The Superfund program continued to promote involvement by interested Indian tribes through SSCs, CAs, CPCAs, and Superfund memoranda of understanding (MOUs). Highlights of FY92 Indian tribe involvement included the following activities.

- EPA negotiated and awarded a CPCA and multi-site CA, each worth \$250,000, to the All-Indian Pueblo Council (Region 6).
- EPA successfully negotiated a Superfund memorandum of agreement between Region 6 and the Inter-Tribal Environmental Council of Oklahoma (representing 22 Indian tribes).
- EPA negotiated and awarded a CPCA and a multi-site CA, of \$450,000 each, to the Inter-

Tribal Environmental Council of Oklahoma. An additional \$20,000 was provided for management assistance at the Tar Creek NPL site on behalf of the Quapaw Tribe (Region 6).

- The Navajo Superfund Program (NSP) received EPA funding to perform site evaluations. With this funding, NSP performed 22 preliminary assessments and 18 site inspections in FY92. The NSP also prepared a quality assurance plan for site sampling (Region 9).
- The Navajo Nation received CPCA funding to develop a tribal code, an MOU for the Navajo Abandoned Mine Lands Program concerning roles and responsibilities for cleaning up uranium mine sites, and administrative systems for addressing the November 1991 Management Assistance Program review. In addition, the agreement supports intermittent inter-governmental personal agreements to assist the nation in its program development efforts (i.e., funding to hire an attorney, an accountant, and a Superfund coordinator) (Region 9).

As an ongoing activity, representatives from EPA's Superfund program participate in the EPA/Indian Tribe Workgroup. The workgroup, in conjunction with the EPA National Indian Program Coordinator, addresses environmental issues affecting Native Americans.

8.4 MINORITY FIRM PARTICIPATION IN SUPERFUND CONTRACTING

Section 105(f) of CERCLA requires EPA to consider the availability of minority contractors when awarding contracts for Superfund work. EPA's Office of Small and Disadvantaged Business Utilization (OSDBU) is responsible for ensuring that the Agency complies with Section 105(f) of CERCLA and has prepared this section of the FY92 Report.

8.4.1 Minority Firm Contracting During Fiscal Year 1992

EPA satisfies Section 105(f) of CERCLA through direct and indirect procurements. EPA procures services directly from minority contractors through contracts and subcontracts. Direct procurements include Small Business Administration 8(a) contracts awarded to minority contractors, prime contracts awarded to minority firms, and subcontracts awarded to minority firms under EPA prime contracts. EPA procures services from minority contracting firms indirectly through contracts and subcontracts awarded by states, Indian tribes, and other federal departments and agencies under Superfund financial assistance agreements. Under cooperative agreements (CAs), states and Indian tribes award contracts and subcontracts to minority firms with funds transferred from Superfund to the state or Indian tribe. Other federal departments and agencies award contracts and subcontracts to minority firms with Trust Fund monies transferred to the agencies under interagency agreements (IAGs).

During FY92, EPA, through direct and indirect procurements, awarded contracts worth more than \$44.5 million to minority contractors to perform Superfund work. This amount represents almost six percent of the total dollars obligated to finance Superfund work during the fiscal year. Exhibit 8.4-1 illustrates that EPA awarded most of the contract dollars (\$30.8 million) to minority contractors through direct procurements. Contracts and subcontracts worth almost \$2.4 million were awarded under EPA/state CAs, including a \$300,000 grant for Superfund training awarded to the National Association of the Minority Contractors (NAMC), a non-profit organization. Other federal agencies awarded more than \$11.3 million in contracts and subcontracts to minority firms under IAGs.

As Exhibit 8.4-2 illustrates, subcontracts accounted for the largest share of EPA direct procurements to minority firms. Subcontracts totalling \$15.2 million were awarded to minority firms by EPA prime contractors. Other direct procurements included \$11.9 million in Small Business Administration 8(a) contracts and \$3.7 million in prime contracts to minority firms.

Exhibit 8.4-1
Minority Contract Utilization During Fiscal Year 1992

Type of Activity	Total Dollars Obligated	Minority Contractor Participation ¹	Percentage of Total
Direct Procurement	\$621,300,000	\$30,800,000	4.95
Cooperative Agreements	111,906,383	2,390,892	2.14
Interagency Agreements ²	29,947,994	11,351,119	37.90
Total	\$763,154,377	\$44,542,011	5.84

¹ This does not include Women's Business Enterprise participation.
² This amount represents the total dollars awarded in FY92 through interagency agreements.

Source: Office of Small and Disadvantaged Business Utilization.

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Minority firms provide three kinds of services to the Superfund program: professional, field support, and construction. Exhibit 8.4-3 illustrates examples of tasks performed.

8.4.2 EPA Efforts to Identify Qualified Minority Firms

OSDBU conducted a number of outreach activities during the fiscal year to identify qualified minority firms and inform them of opportunities available in the Superfund program.

- OSDBU coordinated efforts with the Office of Acquisition Management to establish small business (SB) and small disadvantaged business (SDB) subcontracting goals for all prime contracts. These goals are monitored by contracting officials to ensure and encourage SB/SDB usage.
- In cooperation with NAMC, OSDBU conducted four training sessions to assist minority contractors in becoming more successful in obtaining Superfund direct prime contract and subcontract awards. A total of 140 participants

representing 94 firms took part in the training sessions.

- OSDBU, in cooperation with the States of Utah and Connecticut, hosted minority business enterprise (MBE) and women's business enterprise (WBE) workshops to familiarize minority and women business owners with the opportunities available in Superfund and other EPA programs. A total of 200 people attended the workshops.
- EPA hosted its mid-year MBE/WBE workshop in November 1991 and its annual MBE/WBE workshop in May 1992. These workshops focused on improving minority contractor utilization in the Superfund program.

8.4.3 Efforts to Encourage Other Federal Departments and Agencies to Use Minority Contractors

OSDBU, in cooperation with the Office of Emergency and Remedial Response and Grants

Exhibit 8.4-2
Amount of Money Awarded
to Minority Firms
Through Direct Procurement

Type of Contracts	Total Dollars (in millions)
Small Business Administration 8(a) Contracts	\$11.9
Minority Prime Contracts	3.7
Minority Subcontracts	15.2
Total	\$30.8

Source: Office of Small and Disadvantaged Business Utilization

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Administration Division, developed special conditions that must be included in IAGs between EPA and federal agencies or departments receiving Superfund monies. These conditions ensure that these federal agencies or departments are aware of the CERCLA Section 105(f) requirement to consider the availability of minority contractors when awarding contracts for Superfund work. EPA also requires that federal agencies or departments undertaking Superfund work submit an annual report to EPA on minority contractor utilization.

OSDBU works with other federal agencies to encourage the increased use of minority contractors for Superfund work. For example, as a result of

meetings with OSDBU, the U.S. Army Corps of Engineers increased its utilization of minority firms under Superfund IAGs from \$0.2 million in FY91 to almost \$10.7 million in FY92.

8.4.4 Publications of Interest to Minority Contractors

During FY92, EPA developed several publications to enhance minority contractor utilization in Superfund:

- *Superfund: Qualified Disadvantaged Business Utilization in State Response (April 1992)*—This quick reference sheet concentrates on Disadvantaged Business Enterprise (DBE) utilization where states are managing the cleanup of NPL sites. It focuses on DBE participation in Superfund state programs and provides a regulatory context for contracting practices.
- *Contracting and Subcontracting Guidance to the Superfund Program (May 1992)*—This guidance document identifies subcontracting opportunities under current Superfund contracts, gives a brief description of the tasks to be performed under the subcontracts, and provides a list of individuals to contact concerning specific subcontracting opportunities.

Exhibit 8.4-3
Services Provided by Minority Contractors

Professional	Field Support	Construction
Health Assessments	Drilling/Well Installation	Site Cleanup
Community Relations	Laboratory Analysis	Excavations
Feasibility Studies		Waste Hauling & Drilling
Data Management Security		Security
Geophysical Surveys		Site Support
Remedial Investigations		Facilities
Expert Witness		
Editing		
Air Quality Monitoring		

Source: Office of Small and Disadvantaged Business Utilization.

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